

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

TASIA WILLIAMS and
VINCENT DOYLE,

Plaintiffs,

v.

CITY OF DALLAS, et al.,

Defendants.

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Civil Action No. 3:20-cv-01526-L

MOTION FOR EXTENSION OF TIME TO RESPOND TO DISCOVERY REQUESTS

TO THE HONORABLE COURT:

Defendants Ulysha Renee Hall (“Chief Hall”) and the City of Dallas move for an extension of time to respond to Plaintiffs’ interrogatories and document requests from January 14, 2021 to February 15, 2021. In support of their motion, Defendants state as follows:

1. On December 14, 2020, Plaintiffs served sets of interrogatories and document requests on both Chief Hall and the City. According to Fed. R. Civ. P. ###, the deadline for Defendants’ responses is January 14, 2021.

2. Defendants asked Plaintiffs for an extension of time to respond. Counsel for Plaintiffs and Defendants conferred via e-mail and telephone, but were unable to reach a mutually acceptable agreement.

3. Defendants therefore ask the Court to extend the deadline for their discovery responses to February 14, 2021. There is ample good cause for the requested extension.

4. This case arises from the disruptive protests and civil unrest that took place in Dallas from May 29 to June 1, 2020. The City has preserved an enormous amount of data from that time period in the form of documents, photos, videos and other materials. Defense counsel is working with several City departments to collect potentially relevant materials, and must review the collected materials, determine which are responsive to Plaintiffs' discovery requests, and prepare them for production. This process has proven to be a time-consuming and laborious process.

5. Defendants' discovery efforts have also been hindered by several factors. Plaintiffs served their discovery requests just before the Christmas and New Year holidays. City employees' holiday-related absences have slowed efforts to gather and review protest-related materials.

6. Furthermore, Chief Hall's resignation from the Dallas Police Department as of December 31, 2020 has further disrupted operations. The police department is currently led by an acting police chief, who in turn will be replaced by a new police chief in a few weeks.

7. Finally, the ongoing COVID-19 pandemic continues to hinder cooperation among City employees and departments. Indoor, in-person interactions continue to be unsafe, and thus many employees work remotely.

8. All of these reasons constitute good cause for a one-month extension of time for Defendants to respond to Plaintiffs' discovery requests.

WHEREFORE, Defendants Ulysha Renee Hall and the City of respectfully ask the Court to grant this motion; extend the deadline by which Defendants shall respond to Plaintiffs' discovery requests from January 14, 2021 to February 15, 2021; and grant any further relief that the Court deems necessary and just.

Respectfully submitted,

CITY ATTORNEY OF THE CITY OF DALLAS

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ATTORNEYS FOR DEFENDANTS ULYSHA RENEE
HALL AND THE CITY OF DALLAS

CERTIFICATE OF CONFERENCE

I certify that on January 12-14, 2021, I conferred via e-mail and telephone with Plaintiffs' counsel Daniel Dailey, Michelle Simpson Tuegel, and Adam Greenfield about the nature of this motion and the relief requested. On January 14, 2021, Mr. Dailey indicated that his clients opposed Defendants' requested relief.

/s/ LINDSAY WILSON GOWIN

CERTIFICATE OF SERVICE

I hereby certify that on January 14, 2021, I electronically filed the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the CM/ECF system which will send notification to case participants registered for electronic notice. I further certify that to the extent applicable I have served all case participants not registered for electronic notice by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ LINDSAY WILSON GOWIN